

EXHIBIT B

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

----- X
WANDA OVALLES, INDIVIDUALLY
AND P.P.A A.O., AND WILSON OVALLES,

Plaintiff,

- against -

SONY ELECTRONICS, INC., BEST BUY CO., INC.,
FOXCONN INTERNATIONAL, INC., AND JOHN
DOE CORPORATIONS 1-4,

Defendant.
----- X

Case No. 3:14-CV-137-M-PAS

**DECLARATION OF
JULIO POSSE**

Julio Posse, under penalty of perjury, declares:

1. I am employed by Sony Electronics, Inc. ("SEL") as Director of Corporate Product Safety. I submit this Declaration in opposition to "Plaintiffs' Motion to Strike Objections and Compel Supplemental Discovery Responses From Sony Electronics, Inc." (the "Motion"). I have personal knowledge of the facts and circumstances set forth herein.

2. SEL markets and distributes audio/video electronics and information technology products for the consumer and professional markets, including consumer products such as televisions, camcorders and cameras. Prior to 2014, SEL also marketed, distributed and assembled VAIO personal computers.

3. I have access to all of SEL's information about potential safety-related claims or issues from the customer service, warranty, and repair information maintained by SEL. SEL maintains its own customer experience center ("CEC") which manages telephone calls, emails and other customer service contacts from customers of products sold by SEL in the United States and, as of April 2015, from Canada as well. SEL also maintains service operations

for warranty and other repairs of Sony electronics products (“Repair Operations”). In the ordinary course of business, I do not have access to information about customer service, repair or potential safety issues in countries outside of the United States and Canada.

4. To the extent that any safety-related issues arise in the United States, SEL would have that information in its own systems. In furtherance of company policy, SEL’s CEC, Repair Operations and other employees receive training and are required to immediately notify my office in the event a customer raises a potential safety issue with a Sony product via any form of communication (e.g., a phone call, email, online chat, letter, claim to SEL’s insurer, etc.).

5. I am not aware of any business or legal requirement that I seek any safety-related information from any parent corporation of SEL. In the ordinary course of business, I have no legal right or practical ability to demand or otherwise obtain information from Sony Corporation in Japan.

6. From time to time, SEL receives calls or other contacts from customers who allege that a product purchased from SEL has some defect, problem or potential safety issue. Experience has shown that such customer contacts may or may not involve any actual product defect, problem, or potential safety issue. In many instances, the issue raised by the customer may be the result of a misunderstanding of how to operate the product, conflicts with other connected products or software, or the result of misuse or abuse of the product. SEL cannot determine simply from call logs whether a customer contact implicates an actual product defect or problem, much less a potential safety issue.

7. If the customer contact does not involve a claim of personal injury, property damage, or other potential safety issue, SEL’s CEC and/or Repair Operations address the customer issue. If a customer contact involves a claim of personal injury, property damage,

or other potential safety issue, depending upon the circumstances, SEL will ask the customer to send the product to SEL for investigation, or staff from my office may visit the customer to investigate. Once customers learn that SEL takes potential safety issues seriously and has started an investigation, customers often cease communication, do not send the product to SEL, or claim that they no longer have the product in their possession.

8. Moreover, customers may not contact SEL directly about an alleged product issue, but may instead contact an authorized servicer, or a retailer or other third party dealer. An authorized servicer would be required to provide information to SEL about the customer service issue. However, a third-party retailer or dealer may or may not pass on that claim to SEL, or conduct its own investigation without the involvement of SEL. If such third party does notify SEL of a claim of personal injury, property damage or other potential safety issue involving Sony products, SEL company policy requires that such report be forwarded to my office for investigation.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 13, 2015.



Julio Posse